



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JDG/EAG/AH
F.#2009R01500

271 Cadman Plaza East
Brooklyn, New York 11201

September 2, 2010

By Federal Express

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225 Broadway, Suite 630
New York, New York 10007

Re: United States v. Dmitriy Yakovlev, et al.
Criminal Docket No. 09-587 (ILG)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following additional discovery in the above-captioned case. The government also renews its request for reciprocal discovery.

Upon their arrest on July 24, 2009, the defendants Dmitriy Yakovlev and Julia Yakovlev made statements to law enforcement. Copies of reports documenting the defendants' statements - which have been previously produced to the defendants individually - are enclosed as Discovery Exhibits 191 through 193. Please be advised that (1) the government intends to introduce Dmitriy Yakovlev's statements without redaction, and (2) because some of Julia Yakovlev's statements facially implicate Dmitriy Yakovlev, the government intends to admit a redacted version of Julia Yakovlev's statements to remove any mention of Dmitriy Yakovlev. See Bruton v. United States, 391 U.S. 123 (1968); Richardson v. Marsh, 481 U.S. 200 (1987).

Michael Gold, Esq.
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If you have further questions or requests, please contact us.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/ Elizabeth A. Geddes
James D. Gatta
Elizabeth A. Geddes
Amanda Hector
Assistant U.S. Attorneys

Enclosures

cc: Clerk of Court (ILG) (by ECF) (w/o enclosures)